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Plaintiffs' Co-Lead Counsel

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**PLAINTIFFS'
ADMINISTRATIVE MOTION
TO FILE UNDER SEAL**

Pursuant to Civil Local Rules 79-5 and 7-11 and the Stipulated Protective Order entered by the Court on August 17, 2018 (Dkt. No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to File Under Seal the following Documents (or portions thereof as indicated below):

	Document	Portions Sought to be Sealed
1	Discovery Letter Regarding Plaintiffs’ Request for Production No. 43 (“Discovery Letter”)	Parts of the second and third full paragraphs on page two of the Discovery Letter.
2	Exhibit F	The 3 pages comprising Exhibit F, an excerpt consisting of Bates Numbers FB-CA-MDL-00009462, 9466, and 9467 from a document produced by Facebook Bates Numbered FB-CA-MDL-00009455-9501, to the Discovery Letter designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.
3	Exhibit G	The 1 page comprising Exhibit G, an excerpt consisting of Bates Number FB-CA-MDL-00013451 from a document produced by Facebook Bates Numbered FB-CA-MDL-00013451-13457, to the Discovery Letter designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.

The above-listed documents contain or summarize materials designated “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order entered in this action. *See* Declaration of Matthew Montgomery (“Montgomery Decl.”) ¶¶ 8-9. Pursuant to Local Rule 79-5(e), Defendant, as the Designating Party, bears the responsibility to establish that all of the designated material is sealable.

Pursuant to Civil Local Rule 79-5(d)(1), the following attachments accompany this motion:

- (1) The Declaration of Matthew Montgomery in Support of Plaintiffs’ Administrative Motion to Seal;
- (2) A proposed order that lists in table format the portions Plaintiffs’ Discovery Letter and Exhibits F and G sought to be sealed;

- (3) A redacted version of Plaintiffs' Discovery Letter;
- (4) An unredacted version of Plaintiffs' Discovery Letter; and
- (5) Unredacted versions of Exhibit F and G.

In light of the foregoing, Plaintiffs respectfully request that the Court grant their Administrative Motion to File Under Seal.

Dated: February 12, 2021

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
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By: /s/ Matthew Montgomery
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of February, 2021 at Oakland, California.

/s/ Lesley E. Weaver
Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on February 12, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record. I also caused a copy of the under seal filings to be delivered to all counsel of record via electronic mail.

/s/ Lesley E. Weaver
Lesley E. Weaver